

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO: 2:06-cr-001-SRW
)	
SHARON G. KUHN)	

UNOPPOSED MOTION TO CONTINUE TRIAL

NOW COMES the Defendant, Sharon G. Kuhn, by and through undersigned counsel, and respectfully moves this Court to continue the trial of this action from the present trial date of September 11, 2006, until a later date to allow for the consideration of pretrial diversion in this matter. In support of this Motion, defendant would show:

1. Undersigned counsel requested Pretrial Diversion for Defendant in May 2006, and on August 25, 2006 an additional letter was sent to the Special Assistant U.S. Attorney.
2. The government is still evaluating the Pretrial Diversion request.
3. It is not anticipated that the government's evaluation of this request will be completed on or before the trial date.
4. Special Assistant United States Attorney, Neal B. Frazier, does not oppose a continuance of this matter as it is necessary for an adequate review of the diversion request by the government.
5. Neither the government nor Ms. Kuhn will be prejudiced by a continuance of this matter.

WHEREFORE, Defendant prays that this Unopposed Motion to Continue Trial be granted.

Respectfully submitted,

s/Christine A. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Kent Brunson, Esquire
Assistant United States Attorney
One Court Square, Suite 201
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Capt. Neal B. Frazier, Esquire
Special Assistant U.S. Attorney
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Respectfully submitted,

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